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FILED

JUN 24 2024
U.S. MAGISTRATE JUDGE
BY _____

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 ANTHONY GEORGE HOLLIS,
13 also known as "Ant,"

14 Defendant.

Case No. 2:24-MJ- 557 -MDC

COMPLAINT for violations of:

Count One: 18 U.S.C. §§ 922(a)(1)(A),
923(a), and 924(a)(1)(D) –
Manufacturing and Dealing in Firearms
Without a License

Counts Two, Three, Four and Five:
18 U.S.C. § 922(o) – Illegal Possession
and Transfer of Machine Guns

Count Six: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(B) – Possession of a Controlled
Substance with Intent to Distribute
(Methamphetamine)

20 BEFORE the Honorable Maximiliano D. Couvillier, III, United States Magistrate
21 Judge, Las Vegas, Nevada, the undersigned Complainant, being duly sworn, deposes and
22 states:

23

24

COUNT ONE

Manufacturing and Dealing in Firearms Without a License
18 U.S.C. §§ 922(a)(1)(A), 923(a), and 924(a)(1)(D)

Between on or about May 1, 2024, and on or about May 24, 2024, in the State and Federal District of Nevada and elsewhere,

ANTHONY GEORGE HOLLIS,
a.k.a. "Ant,"

defendant herein, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of manufacturing and dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT TWO

Illegal Possession and Transfer of a Machine Gun
18 U.S.C. § 922(o)

On or about May 1, 2024, in the State and Federal District of Nevada,

ANTHONY GEORGE HOLLIS,
a.k.a. "Ant,"

defendant herein, did knowingly possess and transfer a machine gun, that is: a machine gun conversion device used to modify a Glock-pattern semiautomatic firearm to fire as a fully automatic weapon, enabling said firearm to automatically shoot more than one shot, without manual reloading, by a single function of the trigger, all in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT THREE
Illegal Possession and Transfer of Machine Guns
18 U.S.C. § 922(o)

On or about May 8, 2024, in the State and Federal District of Nevada,

ANTHONY GEORGE HOLLIS,
a.k.a. "Ant,"

6 defendant herein, did knowingly possess and transfer five machine guns, that is: machine gun
7 conversion devices used to modify Glock-pattern semiautomatic firearms to fire as a fully
8 automatic weapon, enabling said firearm to automatically shoot more than one shot, without
9 manual reloading, by a single function of the trigger, all in violation of Title 18, United States
10 Code, Sections 922(o) and 924(a)(2).

COUNT FOUR
Illegal Possession and Transfer of a Machine Gun
18 U.S.C. § 922(o)

On or about May 9, 2024, in the State and Federal District of Nevada,

ANTHONY GEORGE HOLLIS,
a.k.a. "Ant,"

16 defendant herein, did knowingly possess and transfer a machine gun, that is: a machine gun
17 conversion device used to modify a Glock-pattern semiautomatic firearm to fire as a fully
18 automatic weapon, enabling said firearm to automatically shoot more than one shot, without
19 manual reloading, by a single function of the trigger, all in violation of Title 18, United States
20 Code, Sections 922(o) and 924(a)(2).

COUNT FIVE

Illegal Possession and Transfer of Machine Guns
18 U.S.C. § 922(o)

On or about May 24, 2024, in the State and Federal District of Nevada,

ANTHONY GEORGE HOLLIS,
a.k.a. "Ant,"

6 defendant herein, did knowingly possess and transfer three machine guns, that is: machine gun
7 conversion devices used to modify Armalite-15-pattern semiautomatic firearms to fire as a fully
8 automatic weapon, enabling said firearm to automatically shoot more than one shot, without
9 manual reloading, by a single function of the trigger, all in violation of Title 18, United States
10 Code, Sections 922(o) and 924(a)(2).

COUNT SIX

Possession of a Controlled Substance with Intent to Distribute (Methamphetamine)
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(viii)

13 On or about May 13, 2024, in the State and Federal District of Nevada,

ANTHONY GEORGE HOLLIS,
a.k.a. "Ant,"

16 defendant herein, did knowingly and intentionally possess with intent to distribute 50 grams or
17 more of a mixture or substance containing a detectable amount of methamphetamine, a
18 Schedule II controlled substance, in violation of Title 21, United States Code, Section
19 841(a)(1) and (b)(1)(B)(viii).

PROBABLE CAUSE AFFIDAVIT

2 1. Your Complainant, Robert Raybould, Special Agent (SA), Bureau of Alcohol,
3 Tobacco, Firearms and Explosives (ATF), a states the following as and for probable cause:

4 2. Your Complainant is a Special Agent with the Bureau of Alcohol, Tobacco,
5 Firearms and Explosives (ATF). As such, your Complainant is “an investigator or officer
6 charged by the Attorney General with the duty of enforcing any of the criminal, seizure, or
7 forfeiture provisions of the laws of the United States,” within the meaning of Section 3051(a) of
8 Title 18, United States Code; that is, an officer of the United States who is empowered by law to
9 conduct investigations of, execute warrants and to make arrests for offenses against the United
10 States. Your Complainant has been so employed since December 2021.

11 3. Your Complainant is currently assigned to the ATF Las Vegas Group II. Your
12 Complainant is a graduate of the Criminal Investigator Training Program at the Federal Law
13 Enforcement Training Center and Special Agent Basic Training at the ATF National Academy.
14 The training that your Complainant received at the academy totaled over 1,000 hours of
15 education and experience on various topics including formalized instruction in, among other
16 things: firearms, drugs, and violent crime-related investigations, familiarization with United
17 States firearms laws, financial investigations and money laundering, identification and seizure of
18 drug and firearms tracking related assets, physical and electronic surveillance, weapon
19 qualification and tactics, operation and use of confidential sources, and undercover operations.

20 4. As an ATF Special Agent, your Complainant has conducted and participated in
21 both state and federal investigations involving the illegal possession and trafficking of firearms.
22 During these investigations, your Complainant has participated in and/or served as the primary
23 case agent in cases involving various types of investigative techniques, including the use of
24 electronic surveillance, assistance from undercover agents and informants, and the controlled

1 purchases of firearms and narcotics from suspects. Your Complainant has also conducted
2 physical surveillance operations and has experience in recognizing tactics employed by targets of
3 investigations to thwart law enforcement surveillance. Your Complainant has executed
4 numerous federal and state arrest warrants and search warrants, resulting in the successful
5 prosecution of defendants. Your Complainant works with informants and cooperators which
6 has involved, among other things, monitoring meetings and recorded conversations, and
7 generally evaluating the reliability and truthfulness of an informant or cooperator.

8 5. Additionally, your Complainant has authored numerous search warrants for
9 residences, vehicles, electronic devices, tracking devices, and social media accounts. Because of
10 your Complainant's training and experience, your Complainant is familiar with the manner in
11 which illegal firearm and drug traffickers smuggle, transport, store, conceal, and distribute
12 firearms and drugs, as well as how they collect and launder proceeds related to such activities.
13 Your Complainant is also familiar with the manner in which these individuals use telephones,
14 coded communications, false or fictitious identities, and other means to facilitate illegal activities
15 and thwart law enforcement investigations. Your Complainant has also consulted and discussed
16 these investigations with other law enforcement officers and agents who are experienced in these
17 types of investigations.

18 6. Prior to your Complainant's employment as an ATF Special Agent, your
19 Complainant served over fourteen years as a sworn peace officer within the State of Utah at the
20 St George Police Department between August 2007 and November 2021. Your Complainant
21 graduated from the Utah Peace Officer Standards and Training Academy (POST) after receiving
22 approximately 600 hours of formalized instruction pertaining to the investigation and
23 enforcement of laws within the State of Utah. During your Complainant's time as a St George
24 Police Officer and Detective, your Complainant investigated numerous types of crimes including

1 aggravated and simple assaults, homicides, residential and commercial burglaries, possession
2 and distribution of narcotics and controlled substances, gang related crimes, illegal firearm
3 possession as well as other firearm related investigations. In addition to the training and
4 education provided by Utah POST your Complainant attended an additional 1,000 hour of
5 training and education related to interview and interrogation techniques, money laundering,
6 gangs and gang history, human trafficking, firearm trafficking, crime scene documentation and
7 investigation, undercover operations, physical and electronic surveillance, and the operation and
8 use of confidential sources.

9 7. The following is the result of your Complainant's investigation or was provided
10 by other law enforcement officers. The following factual statement is a brief summary of the
11 information that your Complainant has gained from his personal involvement in the
12 investigation and from various intelligence sources currently available with respect to this
13 investigation. Unless otherwise noted, if your Complainant asserts that a statement was made,
14 the information was provided by an ATF Special Agent, LVMPD Detective, or another law
15 enforcement officers (who may have had either direct or hearsay knowledge of the statement) to
16 whom your Complainant has spoken to or whose reports the Complainant has reviewed. Also,
17 this affidavit is being submitted for the limited purpose of seeking authorization for a search
18 warrant. While your Complainant has participated in the below described investigation, your
19 Complainant has not provided every fact known to him within this Complaint. Rather, your
20 Complainant has included only those facts necessary to establish probable cause. All times
21 contained herein are approximate.

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FACTS ESTABLISHING PROBABLE CAUSE

2 8. An investigation by the ATF Las Vegas Field Office determined that between
3 on or about May 1, 2024 and May 24, 2024, Anthony George Hollis, who uses the moniker
4 “Ant,”

5 a. not being a licensed dealer of firearms within the meaning of Chapter
6 44, Title 18, United States Code, did willfully engage in the business of manufacturing and
7 dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a),
8 and 924(a)(1)(D);

14 c. knowingly and intentionally possessed with intent to distribute 50 grams
15 or more of a mixture or substance containing a detectable amount of methamphetamine, a
16 Schedule II controlled substance.

17 9. In April 2024, a person reported to be trading in firearms in or near Las Vegas,
18 Nevada, provided ATF CI#27555, hereinafter referred to as Confidential Informant #1
19 (CI#1¹), a phone number for another person whom he told CI#1 was distributing firearms in
20 the Las Vegas, Nevada area and potentially manufacturing Machine-gun Conversion Devices.

22 ¹ CI#1 has been a Confidential Informant for the ATF for approximately three years and
23 has also received pecuniary payments for his assistance. CI#1's information has proven reliable
24 in the past on several investigations. All information provided by CI#1 is corroborated by law
enforcement investigators. CI#1 signed cooperation agreement and pleaded guilty to one count
of Conspiracy to Make a False Statement in Acquisition of a Firearm and one count of

1 10. A Machine-gun Conversion Device (MCD) is a device that converts a
2 semiautomatic firearm – pistol, rifle, or shotgun – into a fully automatic machine gun. A
3 machine gun is a “weapon which shoots, is designed to shoot, or can be readily restored to
4 shoot, automatically more than one shot, without manual reloading, by a single function of the
5 trigger.” 26 U.S.C. § 5845(b). Because the statutory definition of a machine gun includes “any
6 part designed and intended solely and exclusively, or combination of parts designed and
7 intended, for use in converting a weapon into a machinegun,” *id.*, an MCD by itself is also a
8 machine gun under the law.

9 11. CI#1 called the telephone number he had been given, XXX-XXX-3530,
10 hereinafter referred to as “TARGET TELEPHONE” or “TT,” and reached a male using TT
11 who identified himself as “Ant.” During that call, CI#1 and “Ant” discussed the sale and
12 purchase of firearms and MCDs.

13 12. Your Complainant researched TT using law enforcement databases to further
14 identify “Ant.” In March 2024, a person who identified himself as Anthony G. HOLLIS,
15 hereinafter referred to as “HOLLIS,” had provided TT as a current contact phone number in a
16 report filed with the Las Vegas Metropolitan Police Department (LVMPD) claiming ownership
17 of a firearm seized during a separate LVMPD investigation.

18 13. Cross-referencing the information from the LVMPD report and with other law
19 enforcement, government and commercial databases, your Complainant determined that
20
21

22 Conspiracy to Distribute a Controlled Substance in an unrelated investigation. CI#1 is working
23 for consideration of his charges. Additionally, CI#1 has several arrests for narcotic related
24 offenses, driving violations, probation violations, felon in possession of firearm, and stolen
property offenses. CI#1 was convicted in 2009 for attempt possession of a firearm by felon and
in 2004 for two counts of trafficking a controlled substance.

1 Anthony G. HOLLIS using TT was born on April 22, 1997, and reportedly lived at 7717
2 Sedalia Street, Las Vegas, Nevada.

3 **a. May 1, 2024, Transfer of a Glock Switch MCD**

4 14. On or about May 1, 2024, CI#1 and “Ant” met in person at a park near Durango
5 Station in Las Vegas, Nevada. “Ant” drove a 2017 Mitsubishi Mirage bearing Nevada license
6 plate of 289PCZ, hereinafter referred to a “SUBJECT VEHICLE 1.” During the meeting,
7 “Ant” showed CI#1 two firearms, one AK-pattern rifle and one Glock-pattern pistol, and two
8 unfinished firearm lower receivers (lowers), which Ant retrieved from SUBJECT VEHICLE 1.
9 “Ant” told CI#1 that he printed MCDs locally. As “Ant” and CI#1 discussed future firearm
10 and MCD sales, “Ant” gave CI#1 a “Glock switch” type MCD at no cost. A Glock switch is a
11 type of MCD specifically designed to convert a semiautomatic Glock pistol to a fully automatic
12 machine gun. ATF agents took possession of the Glock switch MCD on May 2, 2024. The
13 Glock switch MCD appeared to be 3D-printed.

14 15. Law enforcement agents showed CI#1 a photo of HOLLIS investigators had
15 obtained from the Nevada Driver License record associated with HOLLIS. CI#1 identified
16 HOLLIS as “Ant,” the individual CI#1 had met with at the park and who had provided CI#1
17 with the MCD.

18 16. Your Complainant queried the Federal Licensing System (FLS) and found
19 HOLLIS does not, nor has he ever had a Federal Firearms License (FFL) issued to him to
20 manufacture, produce, build, transfer, or sale any firearms, including MCDs.

21 17. Your Complainant queried the National Firearms Registry and Transfer Records
22 (NFRTR) and found HOLLIS does not, nor has he ever had any firearms, including but not
23 limited to firearms regulated by the National Firearms Act such as machine guns, MCDs, or

24

1 short-barrel rifles, registered to him, nor had HOLLIS made any applications to have any
 2 firearms, including but not limited to the above NFA regulated items, registered to him.

3 18. At the direction of ATF, CI#1 continued to talk with HOLLIS between May 1,
 4 2024, and May 8, 2024, contacting HOLLIS on TT. HOLLIS told CI#1 that HOLLIS would
 5 potentially have five Glock switch MCDs and two firearms for sale. HOLLIS described the
 6 firearms as the AK-pattern rifle he had shown to CI#1 at the park near Durango Station on or
 7 about May 1, 2024, and a gold-colored Glock style pistol which HOLLIS told CI#1 was in
 8 LVMPD custody. The description of the Clock style pistol matched the firearm your
 9 Complainant found to be in LVMPD custody for which HOLLIS had claimed ownership in
 10 March 2024.

11 **b. May 8, 2024, Controlled Purchase of an AK-Pattern Rifle and Five Glock Switch MCDs**

12 19. On May 8, 2024, ATF, LVMPD, and NLVPD personnel conducted a controlled
 13 purchase operation involving CI#1 and CI#26813, hereinafter referred to as CI#2², of a
 14 Century Arms International model Tantal Sporter 5.45x39mm AK-74-pattern style rifle bearing
 15 serial number TTL00496 and five Glock switch MCDs from HOLLIS.

16 20. Before the scheduled time of the controlled purchase, plainclothes law
 17 enforcement personnel using unmarked vehicles established surveillance around the address
 18 listed on HOLLIS' Nevada Driver License, that is, 7717 Sedalia Street, Las Vegas, Nevada.
 19 Surveillance units noted SUBJECT VEHICLE 1 was not visible near 7717 Sedalia Street.

21

 22 ² CI#2 is a convicted felon. CI#2 has a conviction for a crime of dishonesty, specifically
 23 possession of stolen vehicle, in 2000. CI#2 has worked as an informant for the ATF for
 24 approximately six (6) years. CI#2 works as a CI for monetary gain. CI#2 has provided
 information which has resulted in the seizure of multiple pounds of illegal narcotics, dozens of
 firearms, and has successfully introduced Undercover Agents ("UCA") to further large multi-
 defendant investigations to include federal judicially approved wiretaps.

1 21. In a call monitored and recorded by ATF agents, CI#1 called TT. CI#1 provided
2 directions to the Durango Casino & Resort located at or near 6915 S Durango Drive, Las
3 Vegas, Nevada, where CI#1 and CI#2 were waiting for HOLLIS. HOLLIS arrived at the
4 Durango Casino & Resort in a 2018 Chevrolet Sonic bearing Nevada license plate 288V51,
5 hereinafter referred to a “SUBJECT VEHICLE 2.” Law enforcement surveillance units in the
6 area of 7717 Sedalia Street did not see HOLLIS exit 7717 Sedalia Street, nor did they see
7 SUBJECT VEHICLE 2 leave the area of 7717 Sedalia Street.

8 22. HOLLIS provided CI#2 with a Century Arms International model Tantal
9 Sporter 5.45x39mm AK-74-pattern style semiautomatic rifle bearing serial number TTL00496
10 and five large-capacity magazines, four of which were brand new in unbroken packing.
11 HOLLIS also provided CI#2 with a Zyn nicotine pouch canister that contained 3D-printed
12 Glock switch MCD “legs.” The “leg” is the piece of the Glock switch MCD that extends into
13 the Glock-pattern pistol to depress the trigger bar, causing the pistol to fire continuously at an
14 extremely high rate of fire until the shooter releases the trigger or all ammunition in the pistol is
15 expended. HOLLIS told CI#1 and CI#2 that he left the rest of the Glock switch MCDs – the
16 other parts – in his other vehicle. Telling CI#1 and CI#2 to wait, HOLLIS left the Durango
17 Casino & Resort in SUBJECT VEHICLE 2. Unmarked law enforcement surveillance units
18 followed HOLLIS to a residence at 9794 Villa Lorena, Las Vegas, Nevada, 89147, hereinafter
19 referred to as “SUBJECT RESIDENCE,” where law enforcement personnel saw the garage
20 door open. HOLLIS got out of SUBJECT VEHICLE 2 and entered the residence through the
21 garage. After several minutes, HOLLIS exited the residence and got back into SUBJECT
22 VEHICLE 2. Unmarked law enforcement surveillance units followed HOLLIS as he returned
23 to Durango Casino & Resort in SUBJECT VEHICLE 2.

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1 23. After returning to the Durango Casino & Resort, HOLLIS provided CI#2 with
2 five Glock switch MCD “backplates,” sometimes referred to as “bodies,” that appeared to be
3 3D-printed and a container with metal nuts and bolts. HOLLIS explained the metal nuts and
4 bolts were the Glock switch MCD selector switches. HOLLIS described how to assemble the
5 MCDs, then showed CI#1 and CI#2 how to assemble the various pieces – backplate, leg, and
6 metal nut and bolt – complete a Glock switch MCD. HOLLIS then disassembled the Glock
7 switch MCD, explaining to CI#1 and CI#2 that he keeps the parts separated while he is driving
8 around in case he needs to discard the items in during an encounter with law enforcement.

9 24. CI#2 paid HOLLIS a total of \$1300 in previously recorded U.S. currency, \$800
10 for the Century International Arms AK-74-pattern rifle and magazines and \$500 for the five
11 Glock switch MCDs.

12 25. CI#2 asked HOLLIS to exchange telephone numbers. HOLLIS produced a
13 cellular telephone from his person, appeared to unlock the device with a passcode, and gave the
14 cell phone to CI#2. Using the cell phone handed to him by HOLLIS, CI#2 called CI#2’s cell
15 phone, which was monitored and recorded by ATF agents. The phone number that rang on
16 CI#2’s cell phone was TT.

17 26. HOLLIS showed CI#1 and CI#2 two unfinished firearm lower receivers
18 HOLLIS had in his backpack. HOLLIS told CI#1 and CI#2 he would acquire parts and
19 accessories needed to make the unfinished lower receivers into complete firearms for a future
20 sale. CI#1 and CI#2 both told HOLLIS that because they had served time in prison they could
21 not lawfully acquire firearms, they were interested in acquiring additional firearms from
22 HOLLIS.

23 27. Law enforcement issued an administrative subpoena to NV Energy seeking
24 information on any account in the name of HOLLIS and any account serving SUBJECT

1 RESIDENCE. NV Energy returned records indicating that NV Energy had no record of a
2 current account in the name of Anthony George HOLLIS, but did have record of an inactive
3 account in the name of Anthony George HOLLIS with prior service at a third address – neither
4 7717 Sedalia Street nor 9794 Villa Lorena (SUBJECT RESIDENCE) – but service at that third
5 address had been discontinued in 2023. NV Energy records for that inactive account matched
6 the date of birth and social security number of HOLLIS' DMV record and TT was listed as a
7 means of contact. NV Energy records showed that 9794 Villa Lorena (SUBJECT
8 RESIDENCE) was served by a current account in the name of Rocky Hollis, giving a date of
9 birth in 1976. Clark County Tax Assessor records show that 9794 Villa Lorena (SUBJECT
10 RESIDENCE) was recorded in September of 2023 to a Rocky B Hollis. NV Energy records
11 indicated that account had been active at SUBJECT RESIDENCE in the name of Rocky
12 Hollis.

13 28. Between May 8 and May 9, 2024, HOLLIS, using TT, exchanged text messages
14 and phone calls with CI#2, who was using a monitored and recorded cell phone provided by
15 ATF. HOLLIS told CI#2 that he was acquiring parts and accessories to complete the assembly
16 of various Personally Made Firearms (PMFs) to sell. HOLLIS also offered to CI#2 that he
17 could contact a person who had a metal Glock switch MCD for sale. HOLLIS told CI#2 that
18 he would bring the metal Glock switch MCD and three firearms to CI#2 on May 9, 2024.

c. May 9, 2024, Controlled Purchase of a Palmetto State Armory Glock-Pattern Pistol, a PMF Fabrique Nationale-Pattern Pistol, a PMF Armalite-pattern Rifle, and a Metal Glock Switch MCD

21 29. On May 9, 2024, ATF, LVMPD, and NLVPD personnel conducted a controlled
22 purchase operation involving CI#2, of a metal Glock switch MCD, a Palmetto State Armory
23 Glock-pattern pistol bearing serial number RC006411, a PMF Fabrique Nationale (FN)-pattern
24 pistol, and a PMF ArmaLite (AR)-pattern rifle from HOLLIS.

1 30. Anticipating the planned meeting between CI#2 and HOLLIS, plainclothes law
 2 enforcement in unmarked vehicles established surveillance around SUBJECT RESIDENCE on
 3 May 9, 2024. SUBJECT VEHICLE 1 and SUBJECT VEHICLE 2 were both parked near
 4 SUBJECT RESIDENCE. Law enforcement watched HOLLIS come out of the residence,
 5 unload what appeared to be a black Pelican-type hard roller case, often used to store and
 6 transport firearms, from SUBJECT VEHICLE 2 and load it into SUBJECT VEHICLE 1.
 7 Surveillance units followed HOLLIS as he left SUBJECT RESIDENCE in SUBJECT
 8 VEHICLE 1. Surveillance units followed HOLLIS to Life Storage, located at 9712 West Maule
 9 Avenue,³ Las Vegas, Nevada, 89148, briefly loosing visual contact with HOLLIS twice along
 10 the way. Law enforcement watched HOLLIS access unit 1016 at Life Storage, hereinafter
 11 referenced as "SUBJECT STORAGE UNIT."

12 31. HOLLIS, using TT, continued to exchange text messages and phone calls with
 13 CI#2, who was using a monitored and recorded cell phone provided by ATF. HOLLIS directed
 14 CI#2 to Life Storage, located at 9712 West Maule Avenue, Las Vegas, Nevada 89148, and
 15 further directed CI#2 to meet him at storage unit 1016, SUBJECT STORAGE UNIT. HOLLIS
 16 told CI#2 that he "does his business," or words to that effect, at SUBJECT STORAGE UNIT.
 17 HOLLIS provided CI#2 with a gate code specific to SUBJECT STORAGE UNIT that Life
 18 Storage property management had provided to HOLLIS. HOLLIS met CI#2 in person at
 19 SUBJECT STORAGE UNIT. HOLLIS sold a metal Glock switch MCD, a Palmetto State
 20 Armory Glock-pattern semiautomatic pistol bearing serial number RC006411, a PMF Fabrique
 21

22 3 The Electronic Record of Contracts obtained from Life Storage management indicates
 23 the address of SUBJECT STORAGE UNIT is 9712 West Maule Avenue, Las Vegas, Nevada,
 24 89148. According to the Clark County Tax Assessor online records, the address of the
 SUBJECT STORAGE UNIT is both 9712 and 9722 West Maule Avenue, Las Vegas, Nevada,
 89148. Accordingly, the SUBJECT STORAGE UNIT incorporates both addresses.

1 Nationale (FN)-pattern semiautomatic pistol, and a PMF Armalite (AR)-pattern semiautomatic
2 rifle to CI#2. CI#2 paid HOLLIS a total of \$2800 in previously recorded U.S. currency, \$500
3 for the metal Glock switch MCD, \$650 for the Palmetto State Armory Glock-pattern pistol
4 bearing serial number RC006411, \$750 for the PMF FN-pattern pistol, and \$900 for the PMF
5 AR-pattern rifle. CI#2 asked HOLLIS how to install the MCD onto the Glock-pattern pistol.
6 HOLLIS installed the Glock switch MCD onto the Glock-pattern pistol while explaining the
7 installation process to CI#2, converting the Glock-pattern pistol into a machine gun.

8 32. HOLLIS also showed CI#2 what appeared to be a Sten gun, a World War II-era
9 9x19mm selective fire short-barrel rifle, capable of functioning as a semiautomatic rifle or fully
10 automatic machine gun. HOLLIS told CI#2 that he paid \$5000 for the Sten. CI#2 observed
11 there was an additive manufacturing (AM) machine, commonly referred to as a 3D printer,
12 within SUBJECT STORAGE UNIT. AM machines are tools commonly used to create models,
13 components, parts and/or complete devices with a variety of printing media. AM machines are
14 commonly used to manufacture some types of MCDs, including Glock switches.

15 33. During their May 9, 2024, meeting, CI#2 asked HOLLIS whether he could
16 acquire controlled substances. HOLLIS told CI#2 that he could make some phone calls. CI#2
17 departed SUBJECT STORAGE UNIT with the firearms and MCDs.

18 34. On or about May 10, 2024, HOLLIS, using TT, told CI#2, who was using a
19 monitored and recorded cell phone provided by ATF, that he had contacted a person who
20 would sell controlled substances, specifically methamphetamine, to CI#2.

21 35. Law enforcement personnel requested information on any Life Storage storage
22 units leased by HOLLIS. The business provided a lease application and agreement for
23 SUBJECT STORAGE UNIT entered into by HOLLIS on February 26, 2024.

24

1 36. Between May 9 and May 13, 2024, HOLLIS, using TT, continued to exchange
2 text messages and phone calls with CI#2, who was using a monitored and recorded cell phone
3 provided by ATF. During a recorded phone call, HOLLIS informed CI#2 that HOLLIS had an
4 individual that would sell "glass" for \$175 per ounce. Your Complainant recognizes "glass" to
5 be a vernacular term used to describe methamphetamine, a controlled substance. HOLLIS told
6 CI#2 the individual would sell a pound of "glass" for \$1450. HOLLIS and CI#2 agreed to meet
7 at SUBJECT STORAGE UNIT on May 13, 2024, for the controlled substances transaction.

8 **d. May 13, 2024, Controlled Purchase of One Pound of Methamphetamine**

9 37. On May 13, 2024, ATF, Drug Enforcement Agency (DEA), LVMPD, and
10 NLVPD personnel conducted a controlled purchase operation involving CI#2 and an ATF
11 Undercover Agent, hereinafter referenced as the ATF UC, of one pound of suspected
12 methamphetamine from HOLLIS.

13 38. When law enforcement surveillance units set up around SUBJECT STORAGE
14 UNIT prior to the scheduled time of the controlled buy, HOLLIS was already present inside
15 the SUBJECT STORAGE UNIT. When CI#2 and the ATF UC arrived to meet HOLLIS at
16 SUBJECT STORAGE UNIT, the ATF UC saw a firearm inside an open gun safe in
17 SUBJECT STORAGE UNIT. The ATF UC asked HOLLIS about the firearm. HOLLIS
18 removed the firearm from the safe and handed it to the ATF UC. The firearm appeared to be a
19 Sten gun, a 9x19mm selective fire short-barrel rifle, likely the same Sten gun HOLLIS showed
20 CI#2 during the previous meeting. This time, however, HOLLIS claimed the Sten had
21 belonged to HOLLIS' grandfather. The ATF UC function-tested the firearm, determining that
22 it was capable of functioning as a fully automatic machine gun. The ATF UC returned the Sten
23 to HOLLIS, who placed it back in the safe inside SUBJECT STORAGE UNIT. HOLLIS
24 discussed firearms, manufacturing firearms, and manufacturing MCDs with the ATF UC.

1 HOLLIS told the ATF UC that HOLLIS 3D-prints MCDs two at a time with a 3D printer at
2 HOLLIS' residence. HOLLIS told the ATF UC that his residence "is just down the street," or
3 words to that effect.

4 39. Your Complainant notes that Google Maps measures the shortest direct route
5 between SUBJECT RESIDENCE and SUBJECT STORAGE UNIT to be approximately 2.8
6 miles or 6 minutes of travel time.

7 40. In the presence of CI#2 and the ATF UC, HOLLIS opened a toolbox inside
8 SUBJECT STORAGE UNIT and retrieved a clear bag containing a large amount of
9 translucent white crystallized substance. The ATF UC noted the material to be similar in
10 appearance and packaging as methamphetamine. The ATF UC counted out \$1450 in
11 previously recorded U.S. currency and gave the funds to HOLLIS. HOLLIS explained
12 HOLLIS and an unidentified person whom HOLLIS described as his associate had to go to
13 another individual to acquire the purported methamphetamine the night before.

14 41. HOLLIS also discussed manufacture of fraudulent documents, particularly
15 fraudulent identification and credit cards, showing the ATF UC and CI#2 examples of high-
16 quality forgeries HOLLIS said that he had produced. HOLLIS described using the fraudulent
17 identification documents and credit cards in various criminal schemes. Fraudulent
18 identification and credit cards used in criminal schemes generally fall within the definition of
19 unauthorized or counterfeit access devices under 18 U.S.C. § 1029.

20 42. The ATF UC, accompanied by CI#2, departed SUBJECT STORAGE UNIT
21 with the suspected methamphetamine. At the conclusion of the controlled buy, the ATF UC
22 transferred the suspected methamphetamine to DEA personnel who field tested the substance.
23 The substance presumptively tested positive for methamphetamine. The suspected

24

methamphetamine weighed 466.3 grams, slightly more than one pound. The DEA sent the suspected methamphetamine to the lab for further testing.

3 43. From May 14, 2024, to the present, HOLLIS, using TT, has maintained recorded
4 communications with the ATF UC regarding the manufacture of additional firearms, machine
5 guns and MCDs, the manufacture and use of fraudulent documents, and obtaining controlled
6 substances, including both methamphetamine and “blues,” which your Complainant
7 recognizes to be a vernacular term used to describe fentanyl, a controlled substance.

e.

May 16, 2024, Surveillance of HOLLIS at SUBJECT RESIDENCE and SUBJECT STORAGE UNIT and Observation of Possible Firearm

10 44. On May 16, 2024, law enforcement established surveillance around SUBJECT
11 RESIDENCE. Your Complainant observed HOLLIS emerge from SUBJECT RESIDENCE
12 and enter SUBJECT VEHICLE 1. Surveillance units followed HOLLIS in a covert capacity.
13 Your Complainant saw HOLLIS arrive at SUBJECT STORAGE UNIT without making any
14 stops or deviations between SUBJECT RESIDENCE and SUBJECT STORAGE UNIT.
15 HOLLIS entered SUBJECT STORAGE UNIT. Surveillance units watched HOLLIS place
16 what appeared to be a firearm into a bag while HOLLIS was inside the SUBJECT STORAGE
17 UNIT. HOLLIS exited SUBJECT STORAGE UNIT, secured SUBJECT STORAGE UNIT,
18 and departed in SUBJECT VEHICLE 1. Surveillance units again followed HOLLIS in a covert
19 capacity to a location believed to be HOLLIS' place of employment. Your Complainant noted
20 HOLLIS did not meet with anyone between SUBJECT STORAGE UNIT and his believed
21 place of employment.

22 45. On or about May 20, 2024, HOLLIS, using TT, told the ATF UC that he had
23 three AR-pattern drop-in MCDs to sell to the ATF UC. A drop-in MCD, sometimes referred to
24 as a Drop-In Auto Sear (DIAS), causes a semiautomatic AR-pattern firearm to function as a

1 fully automatic machine gun by releasing the hammer each time the bolt cycles. With a drop-in
2 MCD installed, an AR-pattern firearm will fire continuously until the shooter releases the
3 trigger or all ammunition in the firearm is expended.

4 **f. May 24, 2024, Controlled Purchase of Three AR-Pattern Drop-In MCDs**

5 46. On May 24, 2024, ATF, DEA, and LVMPD personnel conducted a controlled
6 purchase operation involving the ATF UC of three AR-pattern drop-in MCDs from HOLLIS.

7 47. Anticipating the planned meeting between the ATF UC and HOLLIS,
8 plainclothes law enforcement in unmarked vehicles established surveillance around SUBJECT
9 RESIDENCE and SUBJECT STORAGE UNIT the morning of May 24, 2024. Initially,
10 neither SUBJECT VEHICLE 1 nor SUBJECT VEHICLE 2 were seen near SUBJECT
11 RESIDENCE or SUBJECT STORAGE UNIT.

12 48. Later that same morning, the ATF UC contacted HOLLIS on TT. HOLLIS told
13 the ATF UC that he needed to “re-print” the AR-pattern drop-in MCDs. The ATF UC and
14 HOLLIS agreed to meet later that day at the SUBJECT STORAGE UNIT for the sale and
15 purchase of the MCDs.

16 49. Approximately one hour after HOLLIS and the ATF UC spoke, surveillance
17 personnel saw SUBJECT VEHICLE 1 arrive at SUBJECT RESIDENCE. Surveillance
18 personnel watched HOLLIS get out of SUBJECT VEHICLE 1, approach the front door of
19 SUBJECT RESIDENCE, produce a key from his person and used the key to unlock and open
20 the front door of SUBJECT RESIDENCE, and enter SUBJECT RESIDENCE. Soon after,
21 surveillance personnel saw HOLLIS emerge from SUBJECT RESIDENCE, open and get into
22 SUBJECT VEHICLE 1, and drive SUBJECT VEHICLE 1 away from SUBJECT
23 RESIDENCE. Surveillance teams followed HOLLIS in a covert manner to a fast-food
24 restaurant, where they saw HOLLIS buy food at the drive-through, then travel back to

1 SUBJECT RESIDENCE. Surveillance personnel again watched HOLLIS get out of SUBJECT
2 VEHICLE 1, approach the front door of SUBJECT RESIDENCE, open the front door of
3 SUBJECT RESIDENCE, and enter SUBJECT RESIDENCE.

4 50. Approximately fifteen minutes later, surveillance personnel saw HOLLIS emerge
5 from SUBJECT RESIDENCE, open and get into SUBJECT VEHICLE 1, and travel to
6 SUBJECT STORAGE UNIT where the ATF UC was waiting. Law enforcement personnel
7 also identified HOLLIS at the SUBJECT STORAGE UNIT via the management video
8 surveillance system.

9 51. In the presence of the ATF UC, HOLLIS produced a key from his person and
10 used the key to unlock and open SUBJECT STORAGE UNIT. HOLLIS and ATF UC entered
11 into SUBJECT STORAGE UNIT. Inside SUBJECT STORAGE UNIT, HOLLIS handed the
12 ATF UC a Zyn nicotine pouch canister containing three AR-pattern drop-in style MCDs. The
13 ATF UC paid HOLLIS \$300 in previously recorded U.S. currency for the three AR-pattern
14 drop-in style MCDs. HOLLIS discussed manufacturing other firearms and firearm parts with
15 the ATF UC.

16 52. HOLLIS also discussed manufacture of fraudulent documents, particularly
17 fraudulent identification, showing the ATF UC an example of a high-quality forgery of an
18 identification document HOLLIS said that he had produced, bearing HOLLIS' image with a
19 different name and identifying data. HOLLIS handed the document to the ATF UC to
20 examine. HOLLIS described how he manufactures fraudulent identification, and how those
21 fraudulent identification documents can be used to steal vehicles from rental car companies.

22 53. HOLLIS closed and secured SUBJECT STORAGE UNIT. The ATF UC
23 departed. Surveillance personnel watched HOLLIS open and get into SUBJECT VEHICLE 1,
24 then drive away from SUBJECT STORAGE UNIT. Surveillance teams, following HOLLIS in

1 a covert manner, saw HOLLIS meet with an unknown male in the vicinity of SUBJECT
2 STORAGE UNIT. Surveillance teams watched HOLLIS park and get out of SUBJECT
3 VEHICLE 1 and enter a vehicle driven by the unknown male. Surveillance teams covertly
4 followed HOLLIS and the unknown male as they drove around the neighborhood for several
5 minutes. HOLLIS and the unknown male then stopped at a gas station. Neither HOLLIS nor
6 the unknown male exited the vehicle. After several minutes, HOLLIS and the unknown male
7 drove back to where HOLLIS had parked SUBJECT VEHICLE 1, covertly followed by
8 surveillance teams. Surveillance personnel watched HOLLIS get out of the vehicle driven by
9 the unknown male, then open and enter SUBJECT VEHICLE 1. Surveillance teams followed
10 SUBJECT VEHICLE 1 and the vehicle driven by the unknown male until both arrived at
11 SUBJECT RESIDENCE. Surveillance personnel watched both HOLLIS and the unknown
12 male enter SUBJECT RESIDENCE. A short time later, surveillance was terminated.

13 54. An ATF Firearms Enforcement Officer (FEO) conducted a preliminary visual
14 inspection of the 10 machine guns HOLLIS trafficked during the course of this investigation.
15 The ATF FEO opined that each of the 10, that is: the Glock switch MCD HOLLIS transferred
16 to CI#1 on May 1, 2024; the five 3D-printed Glock switch MCDs HOLLIS sold to CI#2 on
17 May 8, 2024; the Palmetto State Armory Glock-pattern pistol with attached metal Glock switch
18 MCD HOLLIS sold to CI#2 on May 9, 2024; and the three drop-in AR-pattern MCDs
19 HOLLIS sold to the ATF UC on May 24, 2024, is properly classified as a machine gun, that is,
20 either a “weapon which shoots, is designed to shoot, or can be readily restored to shoot,
21 automatically more than one shot, without manual reloading, by a single function of the
22 trigger,” 26 U.S.C. § 5845(b), or a “part designed and intended solely and exclusively, or
23 combination of parts designed and intended, for use in converting a weapon into a
24 machinegun,” *id.*

g. June 21, 2024, Arrest and Execution of Search Warrants

2 55. On June 20, 2024, Sgt Price (LVMPD) established phone contact with HOLLIS.
3 HOLLIS agreed to meet with Sgt Price on June 21, 2024 under the guise that HOLLIS would be
4 meeting to collect a firearm belonging to him that was currently in LVMPD custody. During
5 this phone call HOLLIS mentioned he was preparing to travel to Florida for some time.

6 56. On June 21, 2024, agents with ATF and officers with LVMPD and NLVPD
7 established surveillance around 9794 Villa Lorena. Surveillance observed HOLLIS exit the
8 residence and enter the red Mitsubishi Mirage, now bearing a license plate of NV 881 6AZ, and
9 depart from the residence. Surveillance followed HOLLIS and the vehicle until marked LVMPD
10 units conducted a traffic stop on the vehicle in the area of Summit Club Drive and Town Center
11 Drive. HOLLIS was taken into federal custody and has remained in continuous custody since
12 that time. Search warrants executed on SUBJECT STORAGE UNIT and SUBJECT
13 RESIDENCE failed to locate the Sten gun machine gun HOLLIS showed to CI#2 on May 9,
14 2024, and which the ATF UC function-tested on May 13, 2024. Among other evidence, law
15 enforcement personnel located and seized a total of four 3D printers from the SUBJECT
16 STORAGE UNIT and SUBJECT RESIDENCE.

CONCLUSION

2 57. Based upon the information set forth in this application, your Complainant
3 respectfully submits that there is probable cause to believe that Anthony George Hollis, a.k.a.
4 "Ant," violated 18 U.S.C. §§ 922(a)(1)(A), 923(a), and 924(a)(1)(D), Manufacturing and
5 Dealing in Firearms Without a License; 18 U.S.C. § 922(o), Illegal Possession and Transfer of
6 Machine Guns, and 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), Possession of a Controlled
7 Substance with Intent to Distribute (Methamphetamine), Between on or about May 1, 2024
8 and May 24, 2024, as described above.

Robert Raybould, Special Agent
Bureau of Alcohol, Tobacco, Firearms, and
Explosives (ATF)

13 Sworn and subscribed before me on this 24th day of June, 2024.

HONORABLE MAXIMILIANO D. COUVILLIER, III
UNITED STATES MAGISTRATE JUDGE